

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
GREENBELT DIVISION**

In re: Kimberly C. McCain

Case No.: 12-32681 WIL

Debtor(s)

Chapter 7

**MOTION OF DEBTOR TO EXTEND TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE**

Kimberly C. McCain, the Chapter 7 Debtor herein, hereby files this Motion to Extend Time to File a Complaint Objecting to Discharge pursuant to Bankruptcy Rule 4004(b) and in support thereof state as follows:

1. This case was commenced on December 21, 2012, when the Debtor, filed a voluntary petition in this Court for relief under Chapter 7 of Title 11 of the United States Bankruptcy Code.
2. Merrill Cohen was appointed the interim Chapter 7 Trustee by the United States Trustee and is now serving as the Chapter 7 Trustee pursuant to §702(d) of the Bankruptcy Code.
3. The deadline to object to the Debtor's discharge is on or about March 30, 2013.
4. The Meeting of Creditors, scheduled for January 30, 2013, has been rescheduled to March 13, 2013 @ 9:00 a.m.
5. The Debtor requests an extension of the Deadline to Object to Discharge.
6. The proposed extension of time is necessary in order to allow the Trustee to conclude his investigation, as well as that of any creditor to make a determination as to whether or not it would be appropriate to object to the Debtor's discharge.

**WHEREFORE**, the Debtor respectfully requests that this Court enter an Order (i) extending the time to file a complaint objecting to the Debtor's discharge for an additional sixty (60) days, and (ii) granting such other and further relief as is just and proper.

Dated: February 14, 2013

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